

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2021-236-G

In the Matter of:

Exploration and Review of the Gas Purchasing
Policies and Practices of Piedmont Natural Gas
Company, Inc. and Dominion Energy South
Carolina, Inc. Pursuant to Commission Directive
Dated July 21, 2021

**PETITION TO INTERVENE OF
TRANSCONTINENTAL GAS PIPE
LINE COMPANY, LLC**

Transcontinental Gas Pipe Line Company, LLC (“Transco”), pursuant to SC Code of Laws § 58-41-20(A) and SC Code of Regs. 103-825, respectfully submits this timely petition to intervene in the above-captioned proceeding currently pending before the South Carolina Public Service Commission (the “Commission”). In support of its petition, Transco states as follows:

1. On July 21, 2021, the Public Service Commission, during its regularly scheduled Commission Business Meeting, issued a Directive in Docket No. 2021-4-G stating in part:

In follow up to Commissioner questions and witness testimony about whether the Company purchases natural gas from “green” producers that reduce the impact of natural gas production on the environment, I move that the Clerk’s Office open a separate docket for the purpose of reviewing and exploring the gas purchasing policies and practices of Piedmont Natural Gas Company, Incorporated and of Dominion Energy South Carolina, Incorporated. This new docket would review and examine the feasibility for options to consider gas purchasing policies and practices related to ‘responsibly sourced gas’ (RSG) purchases, as well as any financial impact on customers and costs. The Commission staff is directed to establish a procedural schedule allowing for participation by interested parties or stakeholders, as well as to provide for written comment, or report, by each gas utility concerning RSG purchases, percentage of overall gas purchase, impact on rates and costs, and related matters.

2. On July 28, 2021, the Commission opened Docket 2021-236-G relating to the exploration and review of the gas purchasing policies and practices of Piedmont Natural Gas

Company, Inc. (“Piedmont”) and Dominion Energy South Carolina, Inc. (“Dominion”) pursuant to the Commission Directive issued on July 21, 2021, and in accordance with S.C. Code Ann. Regs. 103-817.

3. Transco has a substantial and specific interest in the subject matter of this Docket. Transco is a limited liability company duly formed and existing under the laws of the State of Delaware, with its principal place of business in Houston, Texas. Transco is domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s Office. Transco is a natural gas company engaged in the transportation and sale of natural gas in interstate commerce by means of its natural gas transmission system extending from Texas, Louisiana, Mississippi, and the offshore Gulf of Mexico area through the States of Alabama, Georgia, South Carolina, North Carolina, Virginia, Maryland, Pennsylvania, and New Jersey to its termini in the New York City metropolitan area.

4. Specifically, Transco has substantial business interests with both Piedmont and Dominion including but not limited to transportation and storage service agreements, interconnection agreements, pooling agreements, interruptible transportation agreements and park and loan agreements, all of which could be, on information and belief, substantially and adversely affected by decisions and/or orders issued by this Commission with relation to this Docket.

5. Accordingly, Transco has a direct and substantial interest in the subject matter of this Docket, and for those reasons, among others, Transco’s interest in this proceeding cannot be adequately represented or protected by any other party.

6. The Commission has established a procedural schedule for this proceeding. Importantly, the October 7, 2021, deadline for parties to intervene has not passed and Transco’s petition is timely.

7. Transco's participation would constructively add to this proceeding by contributing to the development of a complete record based on Transco's unique, substantial business interests with both Piedmont and Dominion.

8. Granting Transco's request to intervene in this proceeding is in the public interest and is consistent with the policies of the Commission in encouraging maximum public participation in issues before it.

9. Pursuant to Rule 103-804, Transco states that it is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioner Transcontinental Gas Pipe Line Company, LLC prays that it be allowed to intervene as a party of record and participate fully in this proceeding.

<signature page follows>

Respectfully submitted this 7th day of October, 2021.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Weston Adams, III

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **Petition to Intervene of Transcontinental Gas Pipe Line Company, LLC** to the persons named below at the addresses set forth via electronic mail and e-filing and/or U.S. mail:

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Columbia, South Carolina
October 7, 2021